

EXECUTIVE SUMMARY

There were some administrative changes to the permit as a result of a phone conversation with Mr. Phil Clements, on February 14, 2007. The insignificant activities identified as 6 and 8 on page 14 were deleted. The insignificant activities were a brakeshoe liner chipping operation and a bonder oven. These items have been removed from the facility. Additionally, some minor spelling errors regarding equipment descriptions were corrected on page 10 and page 14. The Division received a notification on March 14, 2007 of the installation of two parts washers and two vibratory units. The parts washers use VOC free solvent. One of the parts washers uses a 350,000 Btu/hour natural gas fired heater and is listed as an insignificant activity. The vibratory units are added to emission unit 34 and have the same monitoring and record keeping requirements as the existing vibratory units.

The issuance of a federally enforceable synthetic minor permit requires a preliminary determination and public notice. This has been done by the Division. An advertisement was placed in the Morganfield Union County Advocate on March 14, 2007. The thirty day comment period has expired with no comments received.

In conclusion, a thorough analysis has been made of all relevant information available which pertains to this application. The Division has concluded that the proposed operation will comply with all air quality regulations and requirements. Therefore, a final determination has been made to issue a proposed permit which will become final upon approval of the EPA.

The Division received notification on April 16, 2007 that Rayloc has ceased operations related to the cleaning process of Vapor Degreasing (EP27 in the proposed permit) as of April 6, 2007. The notification also stated that the vapor degreasing equipment would be removed from the facility in May of 2007. In the final permit, EP27 and all accompanying permit requirements have been deleted.

After the proposed permit was issued, the Division recognized that an error was made in assessing the regulatory applicability of 40 CFR 63.3880 to 63.3981 (Subpart M MMM), "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products", to surface coating operations at Rayloc. This regulation is applicable to the miscellaneous metal parts and products surface coating operations at the facility. Rayloc was a major source of HAP emissions as of January 2, 2007 and the facility still has the potential to emit HAP above major source thresholds (even after the removal of the degreaser). It should be noted that Rayloc failed to submit the initial notification required by § 63.3910 (b) of Subpart M MMM. The compliant material and emission rate without add-on control options of the regulation have been added to the permit, as well as the general record keeping and reporting requirements specified in Subpart M MMM.

No comments were received from the U.S. EPA during the 45-day comment period on the proposed permit which ended on June 4, 2007 therefore it is now the final permit.